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November 6, 2024

Magistrate Judge Peggy Kuo
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Miller, et al. v. Arab Bank, PLC*, No. 18-cv-02192 (HG) (PK)

Dear Judge Kuo:

We represent Plaintiff Adiya Miller and hereby submit a draft of a Request for International Judicial Assistance (Letters Rogatory) to Israel. Pursuant to the Court's direction at the June 20, 2024, conference, Plaintiff once again contacted her doctor to obtain certain medical records requested by Defendant, but her doctor declined to release them. Inasmuch as the doctor is beyond the subpoena power of this Court, the only available avenue to obtain and review the records for relevance is via Letters Rogatory.

The parties have conferred regarding the text of the enclosed proposed Letters Rogatory that Plaintiffs' counsel has drafted, and Defendant has no objection to the proposed language. If the Court approves of the attached Letters Rogatory, it can forward the request to the foreign jurisdiction through official channels. In the alternative, Plaintiffs' counsel can effectuate delivery of the Letters Rogatory to the proper authority in Israel.

If the Court has further questions or needs additional information, the parties are available at the Court's convenience.

Respectfully submitted,



Zahra R. Dean

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